

February 2019

Ozone Data Managers,

The Colorado Department of Public Health and Environment (CDPHE), Air Pollution Control Division (APCD) is currently evaluating calendar year 2018 ambient ozone data for potential stratospheric ozone intrusion events and wildfire smoke events that may be considered for Exceptional Event status as defined by the Code of Federal Regulations (CFR) Title 40 Parts 50 and 51. The APCD has identified five stratospheric intrusion events and twenty wildfire smoke events in 2018, of which, one wildfire smoke event appear to have significantly affected the following Colorado-based United States Forest Service (USFS) operated ozone monitor, Shamrock Mine.

The Exceptional Event Rule (EER) was published March 22, 2007 and became effective May 21, 2007. The EER allows the ambient air quality data which is submitted to AQS and used in making regulatory decisions, to be, in some cases, flagged and, where appropriate, excluded from calculations in determining whether or not an area has attained the standard. As this USFS operated ozone analyzer is, or may be designated as regulatory analyzer, Colorado will be held responsible for making National Ambient Air Quality Standards (NAAQS) determinations from data collected by this analyzer. The data flagged as “exceptional” must have been affected by an exceptional event, which is defined as an event that affects air quality, is not reasonably controllable or preventable, is an event caused by human activity that is unlikely to recur at a particular location or a natural event, and is determined by the EPA, in accordance with 40 CFR 50.14, to be an exceptional event. Ultimately, only flagged events that may affect the designation status of an area will be considered for justification documentation.

Stratospheric ozone intrusion and wildfire smoke events are forecasted and documented by APCD meteorologists for public advisories. Once an event is verified and data is validated, all 1 hour average data associated with the forward looking 8 hour averages in excess of 70 ppb are flagged with an “IO” (stratospheric intrusion) or “IT” (wildfire smoke - U.S.) informational flag in AQS. Additional 1 hour data points occurring prior to the 1 hour points associated with 8 hour averages in excess of 70 ppb may be identified to further clarify the start of the event. Data from this USFS operated ozone monitor was obtained from AQS and evaluated using the same criteria as data from APCD monitors. The following is a date/time range from the USFS operated ozone monitoring site, as identified by the APCD, which has been influenced by wildfire smoke and should be appropriately flagged in AQS with an “IT” (Wildfire-U.S.) informational flag. The APCD does not have the AQS screening group clearance to add informational flags to data collected at USFS air monitoring sites and requests that the USFS consider flagging this data.

Wildfire Smoke Events (“IT” Informational Wildfire Smoke Flag)

8/6/18 Event

Shamrock Mine (08-067-1004) 8/6/18, hour 11 to 8/6/18, hour 20 Max 8hr O3: 72 ppb

EPA is requesting that “IO” or “IT” informational flag be added when initially identifying events. The EPA has not mandated the use of informational flags, however the APCD recognizes the advantages of using them as a way to publicly identify data affected by exceptional events and for their use as placeholders for potential exclusion flags. Conversion of the “IO” and “IT” informational flags to the

“RO” and “RT” exclusion flags along with the inclusions of an event description will be required if the APCD elects to submit demonstration documentation to EPA for concurrence. If elected, this conversion of informational flags to exclusion flags would occur at a later date by an additional request from the APCD.

The APCD appreciates your consideration and any assistance you can provide in adding stratospheric ozone intrusion and wildfire qualifier codes to the above listed data. Please feel free to contact me with questions or comments.

Regards,



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